

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

**CONNOR NEECK**  
and **ISAIAH WEST**,  
individually and on behalf  
of all others similarly situated,

Plaintiffs,

Case No. 19-cv-834

vs.

**BADGER BROTHERS MOVING LLC**,

Defendant.

---

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

---

Plaintiffs, by and through their undersigned counsel, hereby move the Court  
for:

1. An order preliminarily approving the Settlement Agreement in this case;
2. An order granting the parties' Joint Stipulation for Class Certification pursuant to Fed. R. Civ. P. 23; and
3. All other relief as set forth in Plaintiffs' Proposed Order for Preliminary Approval.

For the reasons outlined in the supporting brief filed herewith, the parties believe the Settlement Agreement provides for a fair resolution of the disputes between the parties, and respectfully request that the Court grant preliminary

approval of the settlement.

Respectfully submitted this 4th day of September, 2020.

Attorneys for the Plaintiffs

By: /s/David C. Zoeller

**HAWKS QUINDEL, S.C.**

David C. Zoeller, State Bar No. 1052017

Email: dzoeller@hq-law.com

Caitlin M. Madden, State Bar No. 1089238

Email: cmadden@hq-law.com

Vanessa A. Kuettel, State Bar No. 1088329

Email: vkuettel@hq-law.com

Post Office Box 2155

Madison, WI 53701-2155

Telephone: 608-257-0040

Facsimile: 608-256-0236